

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

In re:)	
)	Case No. 16-23482
LAWRENCE T. MASICLAT)	Chapter 13
MYLENE MASICLAT)	
Debtors,)	Adversary No. 20-00322
<hr/>)	
LAWRENCE T. MASICLAT)	
MYLENE MASICLAT)	
Plaintiffs,)	
v.)	
)	
PERITUS PORTFOLIO SERVICES II,)	
LLC/WOLLEMI ACQUISITIONS, LLC)	
Defendant.)	

NOTICE OF MOTION

TO:

Mohammed O Badwan	Lawrence T. Masiclat
Sulaiman Law Group, LTD	Mylene Masiclat
2500 S. Highland Ave., Suite 200	5721 Caribou Ln.
Lombard, IL 60148	Hoffman Estates, IL 60192
BY ELECTRONIC TRANSMISSION	BY REGULAR MAIL

PLEASE TAKE NOTICE that on the **28th October, 2020, at 11:00 AM**, or as soon thereafter as Counsel may be heard, I will appear Telephonically before the Honorable Jack Schmetterer, or any judge sitting his place, and present the Second Motion for Extension of time to File Answer, a copy of which is attached.

This motion will be presented and heard telephonically using AT&T Teleconference. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must call in to the hearing using the following information – Toll Free Number: 1-877-336-1839; Access Code: 3900709.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

PROOF OF SERVICE

I, the undersigned attorney, certify that I have served a copy of this Notice along with the attached Motion Extension of Time to File Answer attached, upon the below-named persons via ECF and as to the debtor by causing the same to be mailed in a property addressed envelope, postage prepaid, from 7700 Forsyth Blvd., Ste. 1800, St. Louis, Missouri 63105 before the hour of 5:00 p.m. on the 21st day of October, 2020.

Mohammed O Badwan
Sulaiman Law Group, LTD
2500 S. Highland Ave., Suite 200
Lombard, IL 60148
BY ELECTRONIC TRANSMISSION

Lawrence T. Masiclat
Mylene Masiclat
5721 Caribou Ln.
Hoffman Estates, IL 60192
BY REGULAR MAIL

Respectfully submitted,
ARMSTRONG TEASDALE LLP

/s/ Melinda J. Maune
Melinda J. Maune, #49797MO, IL ARDC# 9078537
Amy Tucker Ryan, #6244881
7700 Forsyth Blvd., Ste. 1800
St. Louis, Missouri 63105
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ATTORNEYS FOR MOVANT

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PERITUS PORTFOLIO SERVICES II,)
LLC/WOLLEMI ACQUISITIONS, LLC)
Defendant.)

SECOND MOTION FOR EXTENSION OF TIME TO FILE ANSWER

COMES NOW Peritus Portfolio Services II, LLC/Wollemi Acquisitions, LLC ("Defendant"), by and through counsel, and for its Second Motion for Extension of Time states as follows:

1. On or about August 17, 2020, Debtors filed an Adversary Complaint naming Peritus Portfolio Services II, LLC/Wollemi Acquisitions, LLC as a Defendant.
2. On August 25, 2020, the Court established an Answer deadline of September 24, 2020.
3. On September 30, 2020, the court granted Defendant an extension of time to Answer and extended the Answer deadline to October 22, 2020.
4. Counsel for Defendant requests an additional extension of (14) days to file its Answer. Defendant request that it be given to November 5, 2020 to file its Answer.
5. Defendant's request is made in good faith and is not meant to hinder or delay these proceedings.
6. The undersigned Counsel has been in continuous communication with the Plaintiff's Counsel regarding resolution of the Complaint and has reached terms of a settlement. The additional time is requested to complete the settlement agreement.

WHEREFORE, Defendant respectfully requests that this Court grant it an extension of time, to and including November 5, 2020 to file its Answer to the Adversary Complaint and for such other and further relief as is just and appropriate under the circumstances.

Respectfully submitted,

ARMSTRONG TEASDALE LLP

/s/ Melinda J. Maune

Melinda J. Maune, #49797MO, IL ARDC# 9078537

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ATTORNEYS FOR DEFENDANT